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19		CT OF CALIFORNIA
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21	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK
21	JEREMY DAVIS, CHRISTOPHER	DI AINTHEES INDONOSEDI ODDED
22	CASTILLO, and MONIQUE TRUJILLO individually and on behalf of all similarly	PLAINTIFFS' [PROPOSED] ORDER REGARDING PLAINTIFFS'
23	situated,	OBJECTIONS TO THE SPECIAL
23	,	MASTER'S REPORT AND
24	Plaintiffs,	RECOMMENDATION (DKT. 524)
25	VS.	The Honorable Susan van Keulen
26		Courtroom 6 – 4th Floor
	GOOGLE LLC,	Date: May 3, 2022
27	Defendant.	Time: 2:00 PM
28	Defendant.	J

[PROPOSED] ORDER ON PLAINTIFFS' OBJECTIONS

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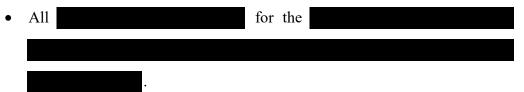
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Before the Court is the Special Master's Report and Recommendation for a preservation plan (Dkt. 524) (the "Special Master's Report"), as well as the parties' separately filed objections to the Special Master's Report, each filed on April 15, 2022. Having considered the Special Master's Report, and the parties' objections thereto, the Court **ADOPTS** the following aspects of Plaintiffs' Objections:

- The Special Master's Report establishes that Google did not meet its preservation obligations in this litigation.
- 2. Google has not met its legal obligation of demonstrating that preservation of a substantially narrowed, relevant subset of records in Google's logs would be unduly burdensome and not proportional to the litigation.
- 3. A sampling-based preservation plan is not warranted in this matter. Any sampling-based preservation plan would result in unfair prejudice to Plaintiffs and Class Members.
 - 4. Google shall preserve the following for all U.S.-based Google Account holders:
 - All sources identified in the Special Master's Report
 - . Although Google has represented that this log is stored The permanently, the Court finds good cause to order that Google continue to preserve all information contained in this log.



- that could be used to
- 5. Google's preservation of this information shall be required through a final judgment in this matter.

1	IT IS SO ORDERED.	
2		
3	DATED:	_
4		Honorable Susan van Keulen
5		United States Magistrate Judge
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